

EXHIBIT A

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SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - MIDDLESEX COUNTY
DOCKET NO. MID-L-003809-18AS

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KAYME A. CLARK and)
5 DUSTIN W. CLARK,) 104 HEARING
)
6 Plaintiffs,) TRANSCRIPT OF
) PROCEEDINGS
7 v.)
) (VOLUME I)
8)
JOHNSON & JOHNSON, et al.,)
9 et al.,)
)
10 Defendants.)

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Place: Middlesex County Courthouse
56 Paterson Street
New Brunswick, New Jersey 08903

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Date: May 29, 2024
9:02 a.m.

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B E F O R E:

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HONORABLE ANA C. VISCOMI, J.S.C.

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1 INDEX

2

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DIRECT CROSS

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5 WILLIAM EDWARD LONGO

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7 EXAMINATION BY:

8 MR. DUBIN

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10 MR. BRALY

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1 A. That's correct.

2 Q. And, in fact, you said that as of
3 2019 you had never analyzed a sample of talc for the
4 presence of asbestos from start to finish using PLM,
5 correct?

6 A. Correct.

7 Q. And at least as of 2023, when we last
8 asked you, you said you had never taken any classes
9 in the type of PLM analysis we're going to be
10 talking about which is referred to as PLM dispersion
11 staining, not a single class, right?

12 A. No, sir.

13 Q. So, it's correct you didn't take a
14 class, right?

15 A. Never taken a class in PLM analysis
16 to understand how to identify asbestos in
17 asbestos-added products.

18 Q. You are a self-taught PLM
19 analysis -- analyst, right?

20 A. Yes, sir. I don't want to sound, you
21 know, braggadocios, but I have a Ph.D. in material
22 science and engineering where you know everything
23 about every type of microscope, et cetera, and
24 typically Ph.D. levels don't take basic PLM classes.
25 I know the science really well on PLM. I could

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1 analyze those samples but it would take me all day
2 so I don't do it.

3 Q. Okay. We'll talk more about that a
4 little bit later but...

5 And if we look at the reports in
6 which MAS has claimed to find chrysotile in
7 Johnson & Johnson, you can see the names of the
8 people who actually did the analysis, right?

9 A. Correct.

10 Q. And you are never listed as the
11 analyst?

12 A. Well, the only people that is listed
13 as the analyst is the person that goes from start to
14 finish. When I sit down or there's a structure that
15 there's some debate on it and I sit down and look at
16 it and go through it, I don't put my name down for
17 one structure. That's not fair.

18 Q. Okay. But, again, the analyst would
19 typically be somebody like a Paul Hess, right?

20 A. Correct.

21 Q. Okay. But you, I think you just said
22 you feel comfortable answering questions today about
23 PLM dispersion analysis and how it's done at MAS,
24 right?

25 A. Yes, sir.

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